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Via e-filing Express

Ms. Lynn M. Retz, Executive Director Kansas Corporation Commission 1500 S.W. Arrowhead Road Topeka, KS 66604-4027

RE: 21-BHCG-026-CPL Supplemental Compliance Filing

Dear Ms. Retz:

Pursuant to the Kansas Corporation Commission's ("Commission") Order Approving Application For Accounting Authority Order ("AAO Order") in Docket No. 20-GIMG-423-ACT, Black Hills filed its first quarterly compliance filing on July 15, 2020. Black Hills explained in the filing that it was unable to complete Parts 3 and 4 by the filing date. Black Hills is making this supplemental compliance filing to file Report Nos. 3 and 4.

Attached are Black Hills' Report Nos. 3 and 4. Report No. 3a contains confidential financial information. Black Hills requests that the Commission treat Report No. 3a as confidential pursuant to K.A.R. 82-1-221a.

Respectfully submitted,

/s/ Dari Dornan

Dari Dornan Associate General Counsel

## **BLACK HILLS ENERGY KANSAS**

# DOCKET NO. 21-BHCG-026-CPL

## **RESPONSE TO THE KANSAS CORPORATION COMMISSION**

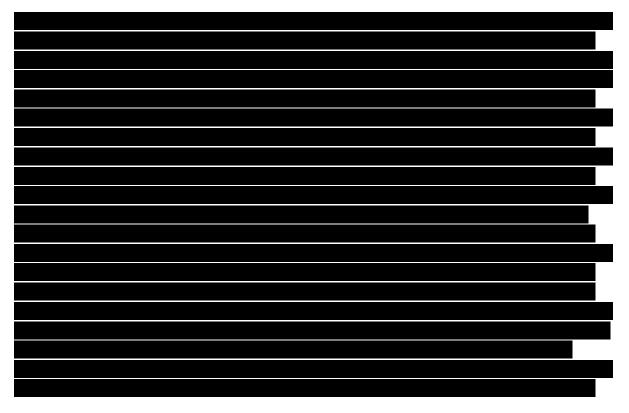
#### <u>REPORTING REQUIREMENTS – Part 3</u>

As soon as possible after the Commission issues an Order approving the AAO, and monthly thereafter, the Gas Utilities shall file the following statistics, by customer class, as well as how these statistics differ from 2019 for the equivalent time period:

## **REQUEST:**

a. A quantification of total past-due customer bills (arrearages) and number of customers experiencing arrearages, that are at 30-days late, 60-days late, and 90- days late

### **CONFIDENTIAL RESPONSE:**





# **REQUEST:**

b. Number of current customers receiving utility service;

## **RESPONSE:**

|             | 202003  | 202004  | 202005  | 202006  |
|-------------|---------|---------|---------|---------|
| Residential | 103,145 | 102,952 | 102,801 | 102,977 |
| Commercial  | 11,541  | 11,480  | 11,440  | 11,408  |
| Industrial  | 1,850   | 1,871   | 1,838   | 1,863   |
| Grand Total | 116,536 | 116,303 | 116,079 | 116,248 |
|             | 201903  | 201904  | 201905  | 201906  |
| Residential | 102,231 | 102,224 | 101,748 | 101,518 |
| Commercial  | 11,539  | 11,500  | 11,468  | 11,416  |
| Industrial  | 1,833   | 1,736   | 1,858   | 1,844   |
| Grand Total | 115,603 | 115,460 | 115,074 | 114,778 |

# **REQUEST:**

c. Number of voluntary and involuntary utility disconnections;

## **RESPONSE:**

| Voluntary Disconnections | 2019-03 | 2019-04 | 2019-05 | 2019-06 |
|--------------------------|---------|---------|---------|---------|
| Commercial               | 267     | 357     | 438     | 294     |
| Industrial               | 16      | 11      | 17      | 9       |
| Residential              | 1,760   | 1,932   | 2,239   | 2,010   |
| Grand Total              | 2,043   | 2,300   | 2,694   | 2,313   |

| Voluntary Disconnections | 2020-03 | 2020-04 | 2020-05 | 2020-06 |
|--------------------------|---------|---------|---------|---------|
| Commercial               | 327     | 275     | 333     | 321     |
| Industrial               | 21      | 12      | 5       | 5       |
| Residential              | 1,973   | 1,713   | 1,791   | 2,216   |
| Grand Total              | 2,321   | 2,000   | 2,129   | 2,542   |

| Involuntary Disconnections | 2019-03 | 2019-04 | 2019-05 | 2019-06 |
|----------------------------|---------|---------|---------|---------|
| Commercial                 | 27      | 70      | 71      | 32      |
| Residential                | 3       | 848     | 561     | 422     |
| Grand Total                | 30      | 918     | 632     | 454     |
|                            |         |         |         |         |
| Involuntary Disconnections | 2020-03 | 2019-04 | 2019-05 | 2019-06 |
| Commercial                 | 15      | 0       | 0       | 0       |
| Residential                | 15      | 0       | 0       | 0       |
| Grand Total                | 30      | 0       | 0       | 0       |

# **REQUEST:**

d. Number of utility reconnections.

# **RESPONSE:**

|                          | 2019-03                        | 2019-04                   | 2019-05           | 2019-06                        |
|--------------------------|--------------------------------|---------------------------|-------------------|--------------------------------|
| Commercial               | 8                              | 9                         | 16                | 8                              |
| Residential              | 1                              | 285                       | 310               | 180                            |
| Grand Total              | 9                              | 294                       | 326               | 188                            |
|                          |                                |                           |                   |                                |
|                          |                                |                           |                   |                                |
|                          | 2020-03                        | 2020-04                   | 2020-05           | 2020-06                        |
| Commercial               | <mark>2020-03</mark><br>4      | <mark>2020-04</mark><br>1 | 2020-05<br>0      | 2020-06<br>0                   |
| Commercial<br>Industrial | <mark>2020-03</mark><br>4<br>0 | 2020-04<br>1<br>1         | 2020-05<br>0<br>0 | <mark>2020-06</mark><br>0<br>0 |
|                          | 2020-03<br>4<br>0<br>9         | 2020-04<br>1<br>1<br>0    | 2020-05<br>0<br>0 | 2020-06<br>0<br>0              |

### **REPORTING REQUIREMENTS – Part 4**

As soon as possible after the Commission issues an Order approving the AAO, and monthly thereafter, the Gas Utilities shall file the following statistics, by customer class:

## **REQUEST:**

a. Number of customers accepting a COVID-19 payment plan;

## **RESPONSE:**

Black Hills Energy Kansas defines COVID-19 payment plans as any payment arrangement plan made outside of the Cold Weather Rule. The table below summarizes the customer counts for all customers arrangements during the reported months, including monthly or two-week extensions and payment arrangements of up to twelve-month.

|             | March | April | Мау | June |
|-------------|-------|-------|-----|------|
| Commercial  | 3     | 7     | 4   | 4    |
| Industrial  |       |       | 1   |      |
| Residential | 159   | 179   | 187 | 191  |
| Total       | 162   | 186   | 192 | 195  |

## **REQUEST:**

b. Average number of months to pay COVID-19 payment plans;

### RESPONSE:

The table below reflects the average number of months customers agreed to pay the amount owed under deferred payment arrangements. Payment terms include weekly, bi-weekly and monthly payments depending on the customer's preference. For informational purposes, the table below also identifies the number of customers each month that specifically entered into a twelve-month payment arrangement.

|            | CUSTOMER CLASS | AVG<br>MONTHS<br>TO PAY | TOTAL<br>CUSTOMER<br>COUNT ^ | CUSTOMER<br>COUNT - 12<br>MO TERM |
|------------|----------------|-------------------------|------------------------------|-----------------------------------|
| March 2020 | Commercial     | 1.1                     | 3                            | 0                                 |
|            | Residential    | 3.0                     | 158                          | 112                               |
| April 2020 | Commercial     | 3.8                     | 7                            | 2                                 |
|            | Residential    | 3.4                     | 179                          | 115                               |
| May 2020   | Commercial     | 6.3                     | 4                            | 2                                 |
|            | Industrial     | 0.5                     | 1                            | 0                                 |
|            | Residential    | 3.5                     | 185                          | 118                               |
| June 2020  | Commercial     | 6.9                     | 4                            | 2                                 |

|             |     | 100 | 07 |
|-------------|-----|-----|----|
| Residential | 2.8 | 180 | 57 |

^ Customer Counts in question 4b may differ slightly from customer counts in the response to question 4a due to the timing of billing the first amount due under the payment arrangement. The customer count in Question 4b reflects customers that have been billed the first payment arrangement amount. The customer count in 4a reflects all customers that have entered an arrangement but may have not been billed the first payment at the time the data was compiled.

## **REQUEST:**

c. Average monthly payment amount for the COVID-19 payment plan; and

## **RESPONSE:**

The table below represents the average amount expected per payment for newly established payment arrangement plans initiated in the reported months. The average amount per payment is calculated using the total arrangement value divided by the total number of payments expected, which includes weekly, bi-weekly, or monthly payment terms.

|            | CUSTOMER<br>CLASS | AVG PAYMENT<br>AMOUNT |
|------------|-------------------|-----------------------|
| March 2020 | Commercial        | \$<br>350.59          |
|            | Residential       | \$<br>34.25           |
| April 2020 | Commercial        | \$<br>177.25          |
|            | Residential       | \$<br>34.51           |
| May 2020   | Commercial        | \$<br>167.13          |
|            | Industrial        | \$<br>731.97          |
|            | Residential       | \$<br>31.66           |
| June 2020  | Commercial        | \$<br>56.47           |
|            | Residential       | \$<br>32.47           |

### **REQUEST:**

d. Number of customers that have broken two COVID-19 payment plans, and thus been disconnected.

### **RESPONSE:**

There have not been any customers that have broken two or more payment arrangements during the COVID-19 time period of March through June of 2020.